

To the FCC Commissioners,

1. I compliment you as the FCC Commissioners on your interest in principle with the American Radio Relay League (ARRL) proposal. The FCC action to initiate a Rulemaking Proceeding is appropriate. I recommend adoption in full by the Commissioners with a determination of operator privileges by license class and maximum RF power.

2. The proposed 5 MHz allocation is reasonably expected to be a very useful frequency band for emergency storm-related communication and also for amateur radio DX operation. I agree. The maximum RF power limit should be the standard 1.5 kW. For emergency operations, in particular, the available operator numbers will be improved by use privileges granted to General Class and higher operators.

3. The proposed band and secondary allocation in the vicinity of 136 kHz will be useful for Very Low Frequency (VLF) experimentation and communication. The RF power limit is suggested to be an absolute minimum of 300 watts in order to compensate for antenna inefficiency at this frequency and the high incidental atmospheric noise level. For experimentation this band should be available to the Technician With HF and higher class licensees.

4. I recommend approval of the proposal to elevate the amateur radio allocation at 2400 to 2402 MHz from secondary to primary. The worldwide amateur radio hobby is demonstrating its continuing and increasing use of this microwave band, in particular relation to the Amateur Satellite Service. Again, this band and higher frequency microwave allocations are assisting the active amateur radio experimentation with very narrowband technology and enhancing actual communication capability. A continued secondary allocation may suggest to those seeking to expand adjacent present or new microwave allocations the possibility to eliminate or compete with amateur radio use. The primary allocation by this proposal has merit, I recommend approval. RF power limits and user qualification should be continued consistent with the balance of this amateur radio band.

Thank you, Commissioners, for this opportunity to reply.

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